

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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NATASHA SEVERIN, *et al.*,

Plaintiffs,

v.

No. 10 Civ. 9696 (DLC)

PROJECT OHR, *et al.*,

Defendants.

-----X

DECLARATION OF JENNIFER SMITH

I, Jennifer Smith , declare under penalty of perjury:

1. I am associated with the firm Beranbaum Menken LLP, attorneys for Plaintiffs, Natasha Severin *et al.*, in the above captioned action. I submit this Declaration in support of Plaintiffs' Motion for Notice and for Partial Summary Judgment.

2. Attached hereto as Exhibit 1 are excerpts from the September 26, 2011 deposition of Defendant D'vorah Kohn, Executive Director of Project OHR.

3. Attached hereto as Exhibit 2 is a copy of Defendants' Personnel Policies and Procedures.

4. Attached hereto as Exhibit 3 are excerpts from the September 20, 2011 deposition of Plaintiff Natasha Severin.

5. Attached hereto as Exhibit 4 are excerpts from the September 23, 2011 deposition of Anna Reydman, Director of Patient Services at Project OHR.

6. Attached hereto as Exhibit 5 are excerpts from the September 28, 2011 deposition of Susan Schaefer, Personnel Manager at Project OHR.

7. Attached hereto as Exhibit 6 is a copy of a sample Plan of Care.

8. Attached hereto as Exhibit 7 is a copy of a sample Nurse's Assessment Visit Report.

9 Attached hereto as Exhibit 9 are excerpts from the September 8, 2011 deposition of Plaintiff Galina Cotova.

10. Attached hereto as Exhibit 10 is a copy of the Collective Bargaining Agreement between Defendant Project OHR and 1191/SEIU New York's Health and Human Services Union.

Dated: New York, New York  
November 4, 2011

Respectfully submitted,

BERANBAUM MENKEN LLP  
Attorneys for Plaintiffs

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